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RMR -D-21



02/27/2005 06:40 PM  
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ning@nps.gov>

River plan and visitor use

Dear Superintendent,

You have shared many ideas and "the plan" has many complex facets. My concern is that many campsites were destroyed, not by floods, but by aggressive acts of overzealous eco-extremists. Those are the river campgrounds. Many have talked about replacing lost sites, but nothing has been done. I fear that "the plan" will end up with the Valley being a private playground for environmental "scientists." I was in the Valley when the Rivers Campgrounds were being dismantled. There was no plan there was only a true "hate" of those camping areas and the long desire to remove them was given the opportunity to jump into action before anyone could object. Note that the truly seriously damaged Lower Pines Campground is still in partial use. The sand deposited by the river during the floods is gone and the roads and infrastructure of the River Campgrounds is plainly there. Now pine encroachment is exploding as we say we want nature to "take its course" as long as it agrees with what the current special interests say. The proof of all this was the battle for Camp 4 (one of my old stomping grounds) and the old cafeteria parking lot that has been taken over by employee tenement mobile homes. There is such huge inconsistency this whole plan.

I understand the need to protect the Wild and Scenic River but camping facilities and hotel rooms have been removed by the hundreds in the name of "saving the river from ourselves." The Valley is becoming more exclusive! It can help aid access to join a special Interest environmental based association but **this is wrong**. Where are the camp grounds that were given lip service in the early Plans? What is going to change other than more limitation of camping and access? You deny it in your folksy newsletter but the reality is clearly there to those of us who care about the Valley and its true open access. I have tried in vain many times to go camping in the Valley and, except in winter, sites are unavailable. This is sad. The visitor center gets a make over but the campgrounds have lost.

Thank you,

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RMR-D-22



ing@nps.gov

er Plan

02/24/2005 02:28 PM  
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Superintendent-

I have been involved with the Master Plan since the 70's and my comments have always been toward preservation not towards visitation. I do not get to personally visit as much since I now live and work in Telluride, Colorado. I have reviewed the new plan via CD Rom and hard copy both sent to me (CD Rom would be fine, but I got both?). I fished and swam in the Merced in the 50's and 60's; the experience has changed much since then. In my opinion, "overuse" has changed the character of all portions of Yosemite Valley and specifically the River corridor. Limitations on use (ie. Alt 4) in my opinion would be beneficial to both preserving the area for future generations, but also for the experience today. Thanks.

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BMR-D-13



03/04/2005 05:15 PM  
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To: "YOSE Planning" <yose\_planning@nps.gov>

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MAR 7 2005

Hello Yosemite Park Planners

YOSEMITE NATIONAL PARK

Thanks for the opportunity to comment on the Revised Merced River Plan. While up-dating the plan, we can avail ourselves of the chance to coordinate it with needed operational revisions to the Yosemite Valley Plan, as it relates to the Merced River Corridor.

I would like to speak to Parking and Traffic Circulation around the Merced River, in the Valley. Some monstrous mistakes were made at Bryce Canyon regarding these modalities. We have time to correct the potential problems at Yosemite.

The Yosemite Valley Plan calls for Out of Valley Parking, along the three entrance routes, in order to reduce congestion in the valley. This concept failed miserably at Bryce Canyon. Since many visitors enter the valley through one route and exit through another route, without ample prior orientation, it would seem pragmatic to utilize the unique situation now in place. No matter which entrance is used, or which exit is used, all vehicles must now circuit the "round-about" of one-way traffic via Pohono Bridge, Bridal Veil Meadow, El Capitan Bridge, etc.

The one place that all visitors have in common to pass, is the area at Taft Toe, where one of the alternative plans proposed for the Yosemite Valley Plan, suggested a parking lot. If this were constructed, instead of the three "Out of Valley Parking Lots", it could be used by all. A mutual Visitor Orientation Center utilized adjacent, to show films and answer visitor's questions, could help visitors understand the various options, before they might board a valley shuttle bus, at that point.

Many visitors, on a tight time schedule, might opt to think that they had already seen the Valley View, Bridal Veil Falls, Ribbon Falls, El Capitan, Cathedral Rocks, the Visitor Orientation Center, and exit the valley at that point, without congesting the East Valley. For those visitors wishing further investigation of the valley's wonders, the West Valley Shuttle Bus System could carry them on to the Interpretive Visitor Center, and connect to the East Valley Shuttle Bus System.

Those with lodging or camping reservations could proceed in their own vehicles. Off season times might allow the choice of proceeding to the Camp Six Parking Area, in their own vehicles, or allowing "first come first serve" use of that parking area as an option, before restricting private vehicle passage into the East Valley.

The Taft Toe Parking Area is also adjacent to current and potential Picnic Areas.

I believe this modality of Parking and Traffic Circulation would greatly relieve congestion in the East Valley, make for a more pleasant visitor experience, and most of all, put much less pressure on the use of the Merced River Corridor

If there is a need for a better understand of the situation at Bryce Canyon, either myself (who has visited there recently), or my friend,

retired Yosemite Park Ranger (who has done volunteer summer work there, for the last few years), would be happy to give further elaboration.

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RMR-D-24



To: yose\_planning@nps.gov

cc:

Subject:

03/04/2005 09:41 AM  
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RECEIVED

MAR 7 2005

YOSEMITE NATIONAL PARK

A Merced River parkway accessible to the public from Hwy 59 bridge, G St bridge, Snelling, or anywhere further up or down river to Yosemite would be a great heritage to leave future generations. We enjoy kayaking this stretch very much but access is difficult nowadays. If there is a planning campaign for such a parkway, I would like to be informed of such. Thanks,  
Winton, CA.

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RMR-D-25

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MAR 7 2005

YOSEMITE NATIONAL PARK



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03/04/2005 02:03 PM  
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To: Yose\_planning@nps.gov

cc:

Subject: Comment: Draft Revised MRP

Thanks so much to the team from the park who patiently answered questions at the public meeting at American River College in Sacramento earlier this week. Combined with document review I feel informed enough to offer the following feedback:

First, I visit Yosemite three to five times each year in every season. As my use of the park relates to the MRP, I use the Mist Trail along the river on the way to Half Dome at least twice a year. This section of trail along the river is, as we all know, significantly more crowded than it was just two or three years ago -- indeed, the area between Yosemite Valley and Half Dome gets the most day use of any wilderness or backcountry zone within the Merced River corridor. From a visitor experience point of view, this increase in visitation means increasingly congested conditions and more and more garbage (especially water bottles) left along the trail. I don't hike the trail to Half Dome during peak visitor season because there are just too many people making too much noise (the number of people using cell phones along the trail (specifically above Vernal Falls, above Nevada Fall and on the summit of Half Dome) have increased significantly (or so it seems clear to me) in the last two or three years.

For this reason, and for the long-term protection of the resources along this heavily-accessed area of the park, I support Alternative 3 allowing park management to limit day use of this area to the existing peak level. If visitor levels are already creating harmful impacts on both visitor experience and on natural resources, these negative impacts are only going to get worse unless a maximum daily quota for visitors entering the wilderness to reach Half Dome is established.

Preserving natural resources *and* public enjoyment of these resources along the river corridor is a delicate balancing act. Given that rising visitor levels are already creating negative impacts in each of these areas, it seems to me that limiting the number of people allowed to access this area is an effective step toward leaving this piece of Yosemite "unimpaired for the benefit and enjoyment of future generations."

Thank you very much for working to preserve Yosemite. And thank you for the opportunity to share how much I love this place and what we can all do to preserve it.

Sincerely,

Carmichael, CA 95608



03/04/2005 11:15 AM  
PST

Subject: Merced River Plan

cc:

To: <yose\_planning@nps.gov>

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RMR-D-26

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MAR 7 2005

YOSEMITE NATIONAL PARK

Dear Yosemite Valley Planners:

Based upon the method that you intend to use to evaluate visitation over the upcoming years, via that VERP system that you love so much, you will see more than five million visitors per year. That is exactly your way of slowing allowing more and more people in, as you develop your crowd control stanchions and systems, i.e., the Lower Falls project, the shuttle systems, etc.

Your other options, the ones that cap visitation at 5 million per year is, as you say not your preferred method. They way you represent your views in the study, indicates that you are trying to sell us on the idea that your preferred option, option two doesn't cap visitation, but keeps the control of visitation levels under the control of the public via the VERP system. Actually, the VERP method will allow the park to continually up the visitation levels until some future time when a public outcry occurs, telling the park to cap it at some point.

Will that outcry ever happen? We only know one thing, and that is that we currently have no way to foretell the future. We can't know if a cap will ever take place because that time will probably happen long after we're all gone. It'll be the park's next generation of visitors, or perhaps three generations from now who may make that decision; but then again, they may never put their foot down and ask the park to restrict visitation once the shuttle system is put into place. Nor do we know if the park will be willing in the future to listen to the public. Unfortunately, the reality is that the park gives us no other options to consider than your "preferred" option, which actually looks good by comparison to the other options you show us, only because, in fact you are not showing the public ALL of your cards.

In a recently sent letter, I told you that I wished that you had offered another option, one that was articulated by someone who really wanted to save the park from over crowding, with a way to cap visitation at a lower level than current levels. You could have taken your option three or four for example, and simply made an adjustment by capping visitation at some place like 3 million for example. Any number that you put in there would of course be arbitrary, so why didn't you offer one that is lower than four million, or current levels, while only offering options with higher than current levels?

I believe that you didn't want to give us any options like that, because you knew many in the public would shun any option that showed a cap at all. Because of that, you knew that if presented in the right way, you could use that desired effect to make all options other than your preferred option look scary. By using that logic, you put a cap of five million on option three and four as the point where no more people would be allowed into the park, and that way the public sees your "preferred" option as looking like the most reasonable. When in fact, your preferred option actually leaves the flood gate open for the potential of far more visitors, perhaps even as many as ten million visitors a year some day. You don't say that in any of your representations of course, which is where I say you are not showing all of your cards to the public. If they knew that, I think they'd probably want to cap it a five million, as crazy as that number seems. Five million is 25% higher than at any time in our history, but by comparison to six million or more, five million actually looks good! But, by the way you presented it, you made it look like the scary options, when in

my mind, the VERP option is the scariest.

Assuming you get your way, visitation in the park will be relative to your VERP system, a system that will allow you to mask the increased visitation, as the crowds will be hard to notice by your new visitors over time, as you will be systematically shuttling visitors in and out of areas in such a calculated manor, that these new visitors won't be able to really notice the increases, much less will they care. The new visitors won't care or notice because they will be first-time visitors who won't have anything to compare what they are seeing to, that is relative to Yosemite's past.

In the end, with option two, your preferred option, I believe visitation can and will creep up to something close to ten million without anyone actually noticing some day. That's because, by then we'll all be gone for one reason or another, resulting in less opposition to your otherwise undisclosed agenda which will play out over many years to come. We won't be around to complain for a variety of reasons. One, we will be gone because you took most of our campsites out. We'll be gone, because we won't be able to find parking places and you know few of these old Yosemite campers are going to come if we have to ride a bus in, or from place to place all of the time. We'll be gone because there will be no picnic areas to drive to, and no barbeques left. We'll be gone, because by the time all of this plays out, most of us will be dead on in a retirement home somewhere. I'll probably have Alzheimers and won't remember writing this letter by that time. Anyway, your the new generation of visitors will have been sold on the VERP system, because you do such a good job selling your ideas, and because there will no longer be anyone like me, with this mindset around in the future to try and convince them that their may have been a better way to go than "preferred option number two" for Yosemite.

Because Yosemite is one absolute finest national park, and I know I am biased, these people who plan for Yosemite's future with the inclusion of the allowance of as much expansion that took place at the Lower Falls area, and with no visitation cap, but instead crowd control measures that will allow unlimited visitation, should all be fired. They should be replaced with people who really would like to do what it is that Fredrick Law Olmsted talked about in his report, the one that the state of California buried in their archives without disclosing for close to a century. The only thing I would suggest, however, is that Fredrick didn't approve of the Indian's burning of the valley's meadows, and I would.

Will you bury this letter like what the State of California did with Mr. Olmstead's old letter of recommendations? Isn't that what you did with many of the public's comments recently with the issue of the Lower Falls areas, when people called on you to rethink your motivation to place that new path on the East side of Yosemite Creek?

You have a far large master plan than what it is that you are showing us, which you intend to implement over time. And, you are in a position to get it done. ...much like city planners in community that love the profits that come hand in hand with expansion, much like what you are doing to Yosemite now. One way or another, you will likely get your expansion project, and the five plus million visitors a year, under terms that you will like. The end result will be that you will have buttered the bread of your concession services company, and your own pockets for many, many years to come.

Doesn't Yosemite deserve better?

Truckee, CA

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Public Comment  
Draft Merced Wild and Scenic River  
Revised Comprehensive Management Plan/SEIS

RMR-D-27  
pg 1 of 5

RECEIVED

Superintendent Yosemite National Park  
P.O. Box 577  
Yosemite, CA 95389

MAR 8 2005

YOSEMITE NATIONAL PARK

My comments on the Draft Revised Merced River Plan/SEIS for the Merced River will focus on issues related to user capacity in Yosemite Valley. The revised document released after many months of intensive effort by a dedicated NPS staff attempts to describe 4 alternatives to create a long overdue user capacity program establishing specific measurable limits on use that both protects the Merced Rivers outstandingly remarkable values (ORV'S) and provide or a quality visitor experience in Yosemite National Park.

After many hours of study and review I have found this document extremely difficult to comprehend. Pertinent data comparing the alternatives are inconsistent, scattered in tables, footnotes and appendices and are almost impossible to decipher. The comparisons may be in there somewhere embedded in a two-inch thick document but I believe they are not presented in a manner suitable for meaningful public review. Unfortunately, at this point in the process I am not sure what can or should be done, but it seems the document in its present form requires at least a brief supplemental summary comparing the alternatives in a more easily understandable manner. A clearly stated summary statement comparing alternatives and a short but reasonably extended public comment period would insure a more meaningful public review process.



There is far too little discussion in the document on how to accomplish the complexities of regulating use once limits are determined whatever they are. An interim limit of 18,241 persons at one time as suggested in the GMP for Yosemite Valley may be a reasonable starting point. What if day and overnight use demand exceeds this number? What if environmental data indicates 18,241 is already too high? Limiting use by segment and zone as suggested in alternatives III and IV and would likely be required under preferred alternative II as well, would be an administrative nightmare for the NPS requiring large but unknown numbers of enforcement personnel and infrastructure developments. A resource oriented interpretive staff would be substituted with one run by a police force herding unlimited numbers of Valley visitors to least desirable venues. The visitor experience would be seriously compromised by these alternatives, and the impacts of increased enforcement staff and infrastructure would have unacceptable impacts to already overused resources.

A far more reasonable and poorly addressed alternative would be to begin to explore the possibilities of implementing a day use reservation system, incorporating a first come first serve component, for a limited number of visitors without a day use reservation. Initially the system would be used only during peak use periods when visitation is expected to exceed capacity. This process should begin with a public awareness and education program describing the need and a system that would guarantee day use entry once a reservation system is in place. Emphasis must be made that a day use reservation system is

not designed to limit access it is designed to guarantee access! There are references in the document to increased visitation that would require implementation of restricted access to Yosemite Valley during peak visitation periods, but there is no discussion as to how that restricted access would be accomplished. A day use reservation system is not only long overdue it is ultimately the only solution to the recreational demands of exploding population growth in near-by central valley and foothill communities. Without a reasonably administered day use system there will be an inexorable and unavoidable return to horrific visitation levels experienced in Yosemite Valley during peak periods in the early 1960's when daily visitation levels in Yosemite stood at nearly 70,000 with a high percentage of the visitation in East Valley destinations. The resulting chaos extant during that period will surely return if a reservation system is not implemented. The system will protect Park resources and insure a quality visitor experience in Yosemite Valley and will help to satisfy the Ninth Circuit Court's directives. Far more emphasis should be given to this issue in any supplements, summaries or revisions to this draft plan. Failure to address a day use reservation system in a comprehensive manner is a serious oversight in this document.

Further, there appears to be no significant discussion of the multi-million dollar construction projects at the Lodge and Curry that were halted by the Ninth Circuit Court directives. References to the projects included under reasonably foreseeable future actions seems to imply the projects will proceed as soon as

the final document is completed, well ahead of the 5- year resource assessment period. If constructed, will new and upgraded lodging units and road projects be torn down and removed if after 5 years, resource assessment indicators determine use levels are too high? Such an action would seem highly unlikely.

Why is there no discussion of the need to hold up on the highly controversial north side drive (NSD) and section D road alignments until a full evaluation of their impacts are made during this five-year resource assessment period? It is imperative that a full re-evaluation of the NSD realignment proposal at Yosemite Lodge be made, as this highly controversial issue is crucial in implementing any VERP process. When a quality visitor experience conflicts with a significant resource protection issue there should be only one outcome, resource protection wins. This is clearly not the case with the planned realignment of the NSD. The NSD realignment could be terminated without interfering with other components of the Lodge Redevelopment Project that otherwise might move forward if this highly controversial element is removed. The development of an EIS for section D later in 2005 may satisfy a legal requirement for proceeding with a project that will allow easier access to ever more and larger vehicles to Yosemite Valley. I thought this process was to promote ideas and projects that would reduce the number and size of vehicles and their impacts on Valley resources. It is difficult to see how proceeding with the section D alignment accomplishes that.

One of the most significant benefits of the Ninth Circuit Court decision was

that it held up these enormous construction projects until a full review of their impacts and need are completed. At the very least the draft document should present a rationale for why they appear to be going forward on an essentially irreversible course prior to the completion of the 5-year resource assessment period.

Unless substantial changes are made in the draft revision it appears to me that everything is on schedule and as soon as the final document and ROD is signed later this year construction will resume. After 5 years of study, the visitation issue dating back to at least 1980, will remain unresolved, and the newly acquired resource assessment data will have to meld into a new infrastructure already in place.

The NSD and section D road alignments are by far the most damaging components of the proposed projects. At the very least if there is going to be any meaningful outcome in this effort to protect the Merced River's ORV'S, NSD and section D must be put on hold until further public review and a full disclosure of their environmental impacts are determined.

Thanks for listening.

in  
ve  
El Dorado Hills, CA 95762

TO: NPS Planning Team:

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RMR-D-28  
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FROM

Oakhurst, CA 93644

RE: Draft Revised Merced River Plan/SEIS; Public Hearing: February 25, 2005

MAR 8 2005

YOSEMITE NATIONAL PARK

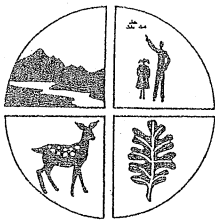
This planning effort is a huge disappointment. The Court ruled the *entire* 2000 River Plan was **INVALID**, citing two deficiencies—one being User Capacity. To assume that all you had to do was plug in some numbers and you're done makes a mockery of the judicial system. User capacity is a foundational element that cannot be considered in isolation. You like to cite John Muir's quote: "When we try to pick out anything by itself, we find it hitched to everything else..." That is—EXCEPT when it involves user capacity. Just like with the first plan—it seems your goal is to get through this nightmare as fast as possible so you can get on with the Valley Plan and spending all the ill-procured flood money.

To make it all the easier, it appears you've learned from Bruce Babbitt that if terminology doesn't work for you—just redefine it. He didn't like the accountability that came with the term "unimpaired" as in the Organic Act—so he came up with a new Director's Order and redefined it; that new definition is now institutionalized in your Management Policies so now it's easier to justify irreparable damage if you're called before a judge. You've done the same thing with User Capacity. The 1982 guidelines define the concept as the quantity of recreation use which an area can sustain without adverse impact on the ORVs and free-flowing character of the river area, without adverse impact on the quality of the recreation experience, and without adverse impact on public health and safety. Instead you've chosen to go with VERP-spin which claims user capacity is only about sustaining the desired resource and social conditions that complement the purpose of the park units and their management objectives. "...complement the purpose of the park units and their management objectives." Mushy words that pander to the political agenda of the day—like recruiting a national tourism czar or standing by while the Yosemite Fund defiles the Falls area—rather than worry about preserving those pesky Merced River ORVs.

You claim undying allegiance to the 1980 GMP and its visitor capacity goals—but even that is disingenuous. The GMP retained 684 drive-in campsites in the Valley; you only want 330. Lodging is even more interesting. The flood actually resulted in the 1260 GMP number for lodging, but apparently the configuration didn't produce enough cash. So tent cabins will be slashed from 567 units to 274 while another 60 cabins w/o bath are slated for upgrades. Overall, you want to tear out a total of 647 tent cabins and drive-in campsites, BUT when it comes to income producing hard-sided lodging—the numbers basically stay the same; BUT 35% of those units will be upgraded and more expensive. You claim your target for overnight capacity is 7711 as stated in the GMP; but using your figures for occupancy, the Valley Plan results in an overnight capacity of 5607. But most disturbing is that this reduction is a direct result of a 52% decrease in the lowest cost overnight opportunities—the types of facilities most affordable to young families and those on limited incomes; the types of facilities that provide a low impact experience directly connected to Yosemite's natural values. And by the way—the GMP numbers cited above already reflect removal of facilities that impact the Merced River.

Let's be honest—the ONLY goal that matters from the GMP is getting private vehicles out of the Valley and converting access to an urban-style mass transit system. That's why user capacity had to be redefined. There was no way the old definition about adverse impacts to ORVs, visitor experience, and public safety would stand up under the crush of a maniacal busing scheme—but now you only have to worry about sustaining the desired conditions that complement the purpose of the park units & their management objectives.

In closing, this document is nothing more than a vague 5-year statement of work masquerading as a "plan." It claims follow-on plans will be reviewed and revised if necessary—that'll be pretty tough when trees have already been logged, facilities have already been constructed, roads have already been realigned, traffic circulation has been reconfigured, and visitation patterns have been altered. After all, you figure you've fulfilled your requirement as soon as this ROD is signed.



## Central Sierra Environmental Resource Center

Box 396 • Twain Harte, CA 95383 • (209) 586-7440 • FAX (209) 586-4986

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RMR-D-29

pg. 1 of 4

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March 7, 2005

MAR 8 2005

YOSEMITE NATIONAL PARK

Superintendent, Yosemite National Park  
P.O. Box 577  
Yosemite, CA 95389  
Attn: Revised Merced River Plan / SEIS

### **RE: Scoping Comments on Draft Merced Wild and Scenic River Revised Comprehensive Management Plan / SEIS**

The following comments are submitted on behalf of the staff and more than 600 members of the Central Sierra Environmental Resource Center (CSERC) in response to the Draft Merced Wild and Scenic River Revised Comprehensive Management Plan /SEIS.

#### **Summary**

First, CSERC acknowledges that Yosemite National Park staff appear to have a sincere desire to protect both the environment and the visitor experience through the current draft plan to manage the Merced Wild and Scenic River on Park lands. That having been said, we believe that there is room for improvement on the current draft of the plan. Our first point - and as you will see below, a central theme to our comments - is *a need for more clarity and specificity throughout the plan*. In particular, *the final plan should specify the resources that are most at-risk from visitor use and clearly detail how those resources will be protected from visitor use*. To increase acceptance of the management plan by the general public, we suggest the final plan should set long-term ground-rules defining and limiting allowable management-actions. We also suggest more detail should be included regarding the "future real-time automated traffic data monitoring" system or other methods for gauging visitor traffic. Finally, in addition to these general comments, we suggest specific changes to the language of the document that we feel will improve its clarity and specificity.

1) **Overall, our central belief is that the final plan should provide greater clarity and specificity than what is now provided in the draft plan.** No matter how good the intentions of Park management are (and we believe they are good), much of the public that is concerned with this plan is inherently suspicious of Park management and will likely oppose any plan unless it clearly specifies or limits future management actions. The public fears a worst case scenario - a crowded, over-developed Merced River corridor, where Nature takes second place to visitor capacity. Your burden with this plan is to clearly demonstrate how the worst case scenario cannot come true.

2) **The final plan should specify the resources that are most at-risk from visitor use and clearly detail how those resources will be protected from visitor use.**

Currently, we don't know exactly what resources are most at-risk and are in need of protection. The most at-risk resources need to be determined and used as indicators *in the final plan*, rather than at some future date. Included in this should be baseline *distribution and abundance data* for applicable species and habitat, including those special status-species listed in Appendix E of the draft plan. At-risk species that we would like to see be used as indicators include, but should not be limited to; California red-legged frog, Foothill yellow-legged frog, Mountain yellow-legged frog, California spotted owl, Yosemite toad, Mountain Red-legged frog, Marten and Fisher. Some distribution and abundance data for these and other at-risk species may already be available as a result of the National Park Service Sierra Nevada Network Inventory and Monitoring Plan. The Inventory and Monitoring Plan, and information that it has generated, should be utilized as part of the Merced Wild and Scenic River Plan.

Specific, quantifiable standards that directly protect the most at-risk resources (indicators) from visitor use also need to be clearly and explicitly stated in the final plan. We suggest that standards be set at no measurable user-associated decline from baseline distribution and abundance.

Specific monitoring protocols should be detailed in the final plan and explain how monitoring will; (a) be able to quantifiably determine the status of the indicators relative to their standards, (b) directly measure cause-and-effect visitor impacts on indicators, and (c) provide for long term trend analysis. In other words, the plan's monitoring component needs to clearly lay out how the monitoring will truly assess the status of at-risk resources and how that monitoring can realistically be carried out.

Specific management actions for each indicator need to be clearly stated in the form of "if-then" statements. For example, "If the abundance of mountain red-legged frogs in any given location declines measurably relative to the baseline abundance due to visitor use, then that location will be closed to visitor use until abundance returns to baseline levels".

**3) The final plan should set long-term ground rules defining and limiting allowable management actions.** The ground-rules should include *all* of the following; (a) a specific, maximum limit on number of users by area (river segment or management zone) per day, (b) a specific, maximum limit on number of users for the entire corridor per year, (c) a specific, maximum limit on development of facilities. Tied to these limits there needs to be specificity as to what the Park Service will do if such limits end up being exceeded.

While CSERC recognizes the value of VERP as a defined decision-making process, simply proposing a decision making process, without setting limits as to what can be decided and acted on, will not be accepted by the public. We believe that this is the message behind the Ninth Circuit Court of Appeals decision that requires "specific measurable limits on use".

**4) The final plan should provide a detailed protocol for tracking visitor distribution and numbers.** Tracking visitor use is a key point in the Merced Wild and Scenic River Management Plan and a detailed plan for exactly how visitor use will be monitored is therefore necessary. The draft plan proposes a "future real time automated traffic data monitoring" system. What exactly does this mean? Will this include automated traffic direction as well? As one method for tracking traffic, CSERC proposes the consideration of RF chip technology. When handed out to incoming vehicles, RF chips can store information on point of entrance, persons per vehicle and destination, and be tracked using monitors placed at key locations such as intersections and parking lot entrances and exits. A more economical alternative involves automated car counters located at key locations (intersections and parking lot entrances and exits) and linked through a network. Such a system could give real-time information on the number of cars in any given area and be used to direct cars away from areas where quotas have been reached.

**5) We suggest use of the term "limit" in place of "quota".** While we acknowledge that one definition of "quota" is "the highest number of people permitted admission", we also feel that a more common use of this term is "a production assignment". We believe that using the term "limit", in place of "quota" throughout the document will be both more clearly understood by the public, and more consistent. Alternative 2 proposes "facility limits". Rather than using a different term for alternative 3 ("segment quotas") and alternative 4 ("management zone quotas"), "limit" should be used throughout ("segment limits" and "management zone limits").



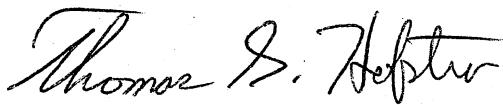
RMR-D-29  
pg 4 of 4

6) **Make it clear that the alternatives for the two objectives (limits on use and El Portal corridor boundaries) are not linked.** Our understanding from reading the Draft Merced Wild and Scenic River Management Plan was that the alternatives for the two objectives are linked - that is if alternative 2 is chosen for limits on use, alternative 2 also must to be chosen for the El Portal corridor boundaries. Based on our subsequent conversations with Park management staff, this does not appear to be the case (and we are glad that it is not). This point should be clarified.

7) **CSERC finds that alternative 2 is the best choice to manage user capacities, and alternatives 3 or 4 best define the El Portal corridor boundaries.** User capacities would best be managed under alternative 3, because, of the current alternatives, it best protects the Merced Wild and Scenic River ORVs while also being most feasible for the Park to implement. Based on input from El Portal advocates and residents we find that alternatives 2 and 4 provide the best protection for the Merced Wild and Scenic River ORVs while also allowing appropriate flexibility for the Park in locating its administrative facilities.

Thank you for the opportunity to submit comments on the Draft Merced Wild and Scenic River Revised Management Plan / SEIS. Please feel free to contact us directly if you have any questions on our comments or require clarification. We are committed to working with Yosemite National Park until a Final Merced Wild and Scenic River Revised Comprehensive Management Plan /SEIS is adopted.

Sincerely,



Thomas S. Hofstra, Ph.D.  
CSERC Staff Scientist

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RMR-D-30  
Pg 1 of 2

My name is George Whitmore, and I reside in Fresno. I am Chair of the Sierra Club's Yosemite Committee. I am speaking on behalf of the Sierra Club.

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The following comments have been prepared in written form to ensure that what I say comes across as intended.

MAR 8 2005

YOSEMITE NATIONAL PARK

Because we will be somewhat critical of the Draft Merced River Plan Revision, we want to make it abundantly clear that we are NOT attacking the individuals within Yosemite National Park, or the consultant entity, who were responsible for giving direction or who actually were involved in preparation of this Plan. That includes those from the Denver Park Service office with whom I have had interaction. Without exception, I find all of you to be likable, open, and helpful, and I have the distinct impression that you are all well-intentioned and that you would like to see a high quality visitor experience made available, while providing a very high level of resource protection.

Those are goals that we share.

We believe that the direction which has resulted in a poor Plan has come from elsewhere, not the people with whom I have had the pleasure of talking.

The Draft Merced River Plan is a mass of contradictions, illogical statements, confusing and inconsistent jargon, and so-called "information" presented in such a way as to defy analysis. The document is internally inconsistent, rendering meaningless any public attempt to comment on content.

The extensive series of public meetings which the National Park Service has been conducting throughout California have made it abundantly clear that those who have attempted to read the document or understand the issues are totally confused. Even some in a sister land-management agency have said that the Plan is a "convoluted mess", and have asked, "How are we supposed to comment on it?" These are people who work for a living analysing EIS's.

DISCLOSURE of the intended action is at the very heart of the NEPA requirements under which this Plan/SEIS was produced.

The Plan/SEIS utterly fails that most basic requirement --- to let the public know what it is that the Park Service intends to do.

The present situation is so chaotic that the Park Service needs to continue taking comments to find out what the problems are, then issue a Revised Draft Plan or possibly a Supplement.

The Revised or Supplementary Draft then would require a NEW COMMENT PERIOD. Only then would the public be able to make comments that are relevant. In the absence of a new document and a new comment period, the

RMR-D-30  
pg 2 of 2

final result probably would be subjected to further litigation.

A new draft, or supplement, and a new comment period, would be the only way that the Plan could be NEPA compliant. The present document simply doesn't cut the mustard.

A new comment period is critical, because that would mean that the revisions were substantial. Any minor tinkering that would avoid the need for a new comment period would NOT be adequate. The present draft requires MAJOR overhaul if further litigation is to be avoided.

The Park Service's preferred alternative does NOT describe any meaningful way of addressing excessive impacts other than directing people to other areas of Yosemite Valley or the Park, thereby transferring the impacts to new areas. This would have a huge impact on the quality of the visitor experience as well as on the natural resources, yet we find little, if any, discussion of these impacts.

In fact, buried in the document is a statement to the effect that these draconian actions could be taken without any further environmental review. If you are going to cram people into a "one size fits all" straitjacket, micromanaging the visitor experience, and damaging the natural resources in the process, we believe it requires further review, AND PUBLIC COMMENT.

A revised document could avoid this unacceptable proposed management direction if it proposed a day use reservation system. People could be assured of getting into the Park, and once in they could be free to enjoy the Park in a way that they would choose, rather than in a way that the Park Service would choose for them.

It is essential that a new document contain significant discussion of a day use reservation system as being a necessary management tool to deal with excessive impacts while preserving the quality of the visitor experience.

It is imperative that a Revised Draft or Supplement be issued, with a new public comment period. This would entail some delay, but the alternative would be further chaos, delay, and frustration.

Thank you for listening.

7 March 2005

National Park Service  
c/o San Francisco Meetings on the revised Merced River Plan  
February 23, 2005

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MAR 8 2005

For the record:

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I have been visiting Yosemite for more than 40 years, and have been actively interested in its future, as outline in the Yosemite Valley Plan, the GMP, and not the Draft Merced River Plan revision (MRP. I submit these thoughts for the record.

I have received and been attempting to understand the Draft Merced River Plan revision (MRP) and must begin by saying that of all the documents I have received about Yosemite issues this one is the most difficult to make any sense out of. However, from what I was able to glean, I would like to make the following comments about proposed alternative 2:

The NPS appears to be proposing a substantial increase in overnight accommodations of all kinds. Some of the proposed numbers are greater than present numbers, and most if them are substantially larger than called for in the 2000 Yosemite Valley Plan (YVP).

Specifically, the YVP calls for 961 lodging units; the MRP calls for 1,262. The YVP calls for 500 campsites (presently 475); the MRP calls for 628. I could find no rationale for the larger numbers other than they are aiming for a total daily maximum of 18,241 visitors, which is the number contained in the 1980 General Management Plan (GMP). If I have missed something I would appreciate being pointed to it, citing a specific page number reference.

Since NPS seems to be proposing a major increase in overnight accommodations, the only way I could visual that NPS could bring the total daily maximum down on peak visitation days would be through a drastic curtailment of day users. This would be a reversal of previous NPS policy to accept the shift in user demand away from overnight and toward day use. Also, while offering greater profit opportunities for Delaware North, it would take business away from the gateway communities.

The fact that the Yosemite Valley Plan (YVP) called for significant reductions in most overnight accommodations (with a slight increase at the Lodge and at Camp Four) was a positive thing. Since the NPS is now proposing not only to abandon the YVP figures, but to increase overnight use even above present levels, I want to restate my SUPPORT OF THE OVERNIGHT USE FIGURES CONTAINED IN THE YVP. (however, I do NOT support the urban redevelopment projects; the numbers can be achieved with existing facilities.)

As to the 18,241 figure in the 1980 GMP being used as a target, it is my understanding that figure was arrived at by counting sleeping and parking spaces in 1980. The figures for both are substantially lower now than they were then, so the 18,241 is no longer relevant. Logically, the corresponding number would be much smaller now, unless a larger number of day users being brought in by bus were assumed. (The YVP did indeed make that assumption. It is unclear what the MRP is assuming.)

It appears that the NPS intends, upon issuance of a Record of Decision (ROD) on the MRP, to proceed with the various construction projects which are presently enjoined. They would NOT immediately remove, upon completion of new construction, the units which were supposedly being replaced. In view of the extensive history of "temporary" facilities ending up being semi-permanent, this approach appears to be A BACK-DOOR WAY OF INCREASING OVERNIGHT ACCOMMODATIONS. THIS IS NOT AN ACCEPTABLE TACTIC.

Day use parking in the East Valley would stay the same as at present at 1,510 spaces, with current additional parking in the West and Mid-Valley areas to remain. The YVP called for ALL Valley parking to be consolidated at the Village at 550 spaces.

RMR-D-31  
pg 2 of 2

Although Alternative 2 is characterized as being the "Interim Facility Limits" alternative, I could find no commitment to any sense of limitation which would satisfy the Ninth Circuit Court mandate. In particular, it seems very strange that the supposed interim limits on overnight accommodations would involve larger numbers than at present. Logically, an interim limit would mean sticking with the present numbers, not increasing them with new construction.

I found a fair amount of reference to the possible need to impose "restrictions" and "limits", but scant reference to a day use reservation system. Specifically, the NPS new Fact Sheet, which is intended to provide an "overview" of the MRP, issued February, 2005, poses the hypothetical question, "Will the park close the gates if limits are reached?" It responds to the question by saying,

"Turning people away at entrance gates - or otherwise closing park entrances - is NOT being proposed in the preferred alternative....".

Yet in Table II-9 (page II-52) of the preferred alternative, under "Rationing and Allocation", one "tool" listed is "Limit overall number of users through entrance station quotas". Their appears to be a substantial conflict between the statement in the Fact Sheet and the statement in the MRP.

For the record, I want to state that I ABSOLUTELY SUPPORT A DAY USE RESERVATION SYSTEM for Yosemite Valley, THAT IS ON A WHEN AND WHERE NEEDED BASIS. I also believe that the NPS should adhere to the numbers prescribed in the GMP (18,241 for YV). That number can be the initial basis for a day use reservation system. Then, if future monitoring shows continuing degradation at this level, the number can be reduced. [And, in the unlikely event that monitoring shows no problems, the number could be increased.]

Finally, in what I have been able to glean from Alternatives 3 and 4, they appear to be totally infeasible. I think it would be an administrative nightmare trying to implement either 3 or 4.

Thank you for this opportunity to comment.

Respectfully,

San Francisco, CA 94110